

**COMMONWEALTH OF MASSACHUSETTS**

**MASSACHUSETTS**

**DEPARTMENT OF TELECOMMUNICATIONS & ENERGY**

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Petition of Boston Gas Company d/b/a  
KeySpan Energy Delivery New England

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D.T.E. 03-40

**FIFTH SET OF INFORMATION REQUESTS OF THE  
MASSACHUSETTS OILHEAT COUNCIL, INC. AND  
THE MASSACHUSETTS ALLIANCE FOR FAIR COMPETITION, INC.**

- MOC-5-1: For each heating season commencing with 1999 - 2000 through 2002 - 2003, please provide the following:
- (a) the number of times the Company has interrupted its gas interruptible customers (if applicable, separately state temperature controlled customers);
  - (b) the dates and duration of each interruption;
  - (c) the type of backup fuel used by each customer;
  - (d) the reason for such interruption; and
  - (e) the amount of natural gas that would have been consumed by each customer had they not been interrupted.
- MOC-5-2: For each heating season commencing with 1999 - 2000 through 2002 - 2003, please provide the following:
- (a) the number of customers and number of times that the Company's interruptible customers chose to voluntarily interrupt service themselves and go to their backup fuel;
  - (b) the dates and duration of each interruption;
  - (c) the reason for such customer's voluntary interruption; and

(d) the type of backup fuel used by each customer.

MOC-5-3: Please identify and describe the Company's procedure of interrupting its interruptible customers. If such procedure is documented, please provide such documentation.

MOC-5-4: Please identify and describe the Company's policy, rules and/or procedure requiring its gas interruptible customers to have and maintain adequate backup fuel during periods of interruption. If such policy, rule or procedure is in writing, please provide such documentation, including any relevant tariff revisions.

MOC-5-5: Please identify and describe the manner and procedure by which the Company enforces its requirements and policies for:

(a) the failure of a gas customer to interrupt when so demanded by the Company; and

(b) the failure of the gas interruptible customer to comply with and maintain adequate backup fuel for interruption.

MOC-5-6: Provide any study, research, reports, or other documents prepared by or for the Company concerning forecasts of the growth, both in terms of numbers of customers and quantity of gas needed for future gas interruptible customers.

MOC-5-7: Please review and identify the document annexed hereto as MOC Attachment to MOC-5-7 entitled "The Role of Interruptible Natural Gas Customers in New England Heating Oil Markets, November, 2002".

MOC-5-8: Please review and identify the document annexed hereto as MOC Attachment to MOC-5-8 entitled "A Report to the Great and General Court Pursuant to Chapter 34 of the Acts of 2000" by the Office of Consumer Affairs and Business Regulation, March 10, 2000. Please provide all reports, studies and other documentation that was supplied to the Massachusetts D.T.E. concerning historical and current data on interruptible natural gas customers' gas usage (see Recommendation No. 4 to Report, p. 6).

MOC-5-9: Please review and identify the document annexed hereto as MOC Attachment to MOC-5-9 entitled "A Study of New England and Massachusetts Petroleum Infrastructure and Distribution Systems" prepared by IFC Consulting, Inc. for Massachusetts Division of Energy Resources, June, 2002.

- MOC-5-10: Please provide a list of the AFUE ratings, or other efficiency ratings, of all the equipment (i.e. furnaces, boilers, etc.) that the Company offers potential conversion customers free of charge, with a rebate, or with any discount.
- MOC-5-11: In response to AG-1-73, the Company provided copies of a number of advertisements including the KeySpan Energy Delivery publication Home, News & Views, Volume 4, No. 1. Therein an advertisement entitled "Get Plumbers' Quotes on Line" describes an Internet-based service for receiving quotes from plumbers to competitively bid for conversion or upgrade work. Please describe this program and indicate the arrangements between such plumbing contractors and the Company regarding the website leads. Include in your answer an explanation whether the plumbers are required to pay for such website access, or any other web related activity provided by the Company.
- MOC-5-12: In many of KeySpan's promotional conversion programs, the Company states that it guarantees customer satisfaction. Please verify that the Company provides customer satisfaction guarantees with any conversion from an alternate fuel to natural gas. Please provide the following further information:
- (a) any statement, or document that details the Company's guarantee;
  - (b) whether such guarantee applies to the Company's representations on price; and
  - (c) for each year commencing from 1999 to 2003 (to date), the number of customers that have exercised their rights under the Company's guarantee, the nature of the claim and the Company's response thereto.
- MOC-5-13: For each year commencing in 1999 to 2003 (to date), please indicate the number of safety-related calls regarding carbon monoxide incidents that the Company has received. For each event where there was a health related incident, please give details of the nature and extent of injuries and ultimate disposition of each matter.
- MOC-5-14: For each year commencing in 1999 to 2003 (to date), please indicate the number of safety-related calls that the Company has received regarding property damage and personal injury other than those relating to carbon monoxide incidents. For each incidence where there was a property damage or personal injury problem, please give details of the nature and extent of such damage and/or injuries and the ultimate disposition of each matter.

Dated: June 16, 2003